

HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

DINAH CANADA, MARIE JOHNSON-  
PEREDO, and ROBERT HEWSON on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

MERACORD, LLC; LINDA REMSBERG and  
CHARLES REMSBERG, individually and on  
behalf of the marital community; LLOYD E.  
WARD and AMANDA GLEN WARD,  
individually and on behalf of the marital  
community; LLOYD WARD, P.C.; LLOYD  
WARD & ASSOCIATES, P.C.; THE LLOYD  
WARD GROUP, P.C. (D/B/A LLOYD  
WARD GROUP II); WARD HOLDINGS,  
INC.; and SETTLEMENT COMPLIANCE  
COMMISSION, INC.,

Defendants.

NO. 3:12-CV-05657-BHS

**SECOND DECLARATION OF C. ALLEN  
GARRETT JR. IN SUPPORT OF THE  
MERACORD DEFENDANTS' MOTION  
TO DISMISS BASED ON LACK OF  
SUBJECT MATTER JURISDICTION**

SECOND DECLARATION OF C. ALLEN GARRETT JR. IN  
SUPPORT OF THE MERACORD DEFENDANTS' MOTION TO  
DISMISS, ETC. (3:12-CV-05657-BHS)

**Andrews ■ Skinner, P.S.**  
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**SECOND DECLARATION OF C. ALLEN GARRETT JR.**

I, C. ALLEN GARRETT JR., hereby declare:

1. My name is C. Allen Garrett Jr. I am one of the attorneys for Meracord LLC, Charles Remsberg, and Linda Remsberg (collectively, the "Meracord Defendants"), Defendants in the above-captioned action. I am over the age of eighteen and have personal knowledge of the matters stated herein as a result of my representation of the Meracord Defendants.

2. On November 12, 2012, Plaintiffs served their "Initial Disclosures" in this action. A true and correct copy of Plaintiffs' "Initial Disclosures" is attached hereto as **Exhibit A**.

3. On May 5, 2013, I served the "Meracord Defendants' Amended Rule 68 Offer of Judgment as to Plaintiff Johnson-Peredo" upon all counsel of record in the above-captioned action, by e-mail and by U.S. mail. A true and correct copy of the Amended Offer of Judgment to Plaintiff Johnson-Peredo, together with my cover e-mail to Plaintiff's counsel (other exhibits and prior e-mails in this e-mail chain omitted), is attached hereto as **Exhibit B**.

4. On May 24, 2013, I served the "Meracord Defendants' Second Amended Rule 68 Offer of Judgment as to Plaintiff Johnson-Peredo" upon all counsel of record in the above-captioned action, by e-mail and by U.S. mail. A true and correct copy of the "Meracord Defendants' Second Amended Rule 68 Offer of Judgment as to Plaintiff Canada" is attached hereto as **Exhibit C**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 24, 2013.

s/ C. Allen Garrett Jr.

C. Allen Garrett Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

s/ C. Allen Garrett Jr.  
C. ALLEN GARRETT JR. (*pro hac vice*)  
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*One of the Attorneys for the Meracord Defendants*